Commonwealth of Kentucky
Environmental and Public Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
(502) 573-3382

AIR QUALITY PERMIT

Issued under 401 KAR 52:030

Permittee Name:	**Fort James Operating Company**
Mailing Address:	**133 Peachtree St. NE** **Atlanta, GA 30301**
Source Name:	**Fort James Operating Company**
Mailing Address:	**451 Harbison Rd** **Lexington, Kentucky 40511**
Source Location:	**451 Harbison Rd, Lexington, KY**
Permit Number:	**F-04-021**
Log Number:	**55234**
Activity ID #:	**APE20040002**
Review Type:	**Operating, Conditional Major**
KYEIS ID #:	**021-067-00052**
AI #:	**1051**
Regional Office:	**Frankfort Regional Office** **643 Teton Trail, STE B** **Frankfort, KY 40601-1758** **(502) 564-5043**
County:	**Fayette**
Application Complete Date:	**July 21, 2004**
Issuance Date:	**April 5, 2005**
Expiration Date:	**April 5, 2010**

John S. Lyons, Director
Division for Air Quality

TABLE OF CONTENTS

SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application the Kentucky Division for Air Quality hereby authorizes the operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and received a permit for the planned activity from the permitting authority, except as provided in this permit or in 401 KAR 52:030, Federally-enforceable permits for non-major sources.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

01 (01) Four (4) Polystyrene Extruders, Electrically heated
One (1) Thermoforming Machine

Description: One (1) 8" Extruder
One (1) 4 1/2" Extruder
One (1) 3 1/2" Extruder
One (1) 2 1/2" Extruder
One (1) Brown Machine Co. MC5500/T-350 Thermoforming System
Two (2) Scrape/Trim Grinders
Maximum continuous rating: 5,100 lbs/hour
Installed (10/01/1987)
Control Equipment: Dry Filter for Particulate Control
Tri-Sac 95144-34 8PKT 10/11 (poly on metal frame)
Manufacturer – Sternvent Co. Inc
Exhaust flow rate – 3600 CFM (@1640 rpm)

APPLICABLE REGULATIONS:
401 KAR 52:030. Federally-enforceable permits for non-major sources. Applicable to sources that accept permit conditions that are legally and practically enforceable to limit their potential to emit (PTE) below the major source thresholds that would make them subject to 401 KAR 52:020.

401 KAR 59:010, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

1. Operating Limitations:

A. 401 KAR 59:010
Particulate filters shall be in place and functional at all times of operation.

B. The usage rate of raw materials in all affected facilities shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

2. Emission Limitations:

A. 401 KAR 59:010

(1) Section 3(1)(a) limits visible emissions from each stack to less than 20% opacity.
Compliance Demonstration Method:
See **4. Monitoring Requirements**

(2) Section 3(2) limits emissions of particulate matter to 6.41 lbs/hr at the maximum rate of 5100 lbs/hour. For process rates between 1000 lbs/hr and 5100 lbs/hr, the allowable emissions should be calculated from the following equation;

$$E = 3.59 * P^{0.62}$$

Where, E = rate of emission in lb/hr
P = process weight rate in tons/hr

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

2. Emission Limitations (continued):

For processing rates of 1000 lbs/hr or less, the allowable emission rate is 2.34 lbs/hr.
Compliance Demonstration Method:
See **4. Monitoring Requirements**

B. See Section D for HAP emission limitations.

Compliance Demonstration Method:
HAP emissions from the above affected facilities shall be calculated using the equations below. Emissions are totaled source wide using the equations of Section D of this permit and compared with the limits set therein.

Styrene Emissions, (lbs) = 0.2563 (lbs/ton) x (tons of polystyrene pellets used)
Ethyl Benzene Emissions, (lbs) = 0.2563 (lbs/ton) x (tons of polystyrene pellets used)

3. Testing Requirements:
If deemed necessary, the Cabinet shall require testing for particulate emissions in accordance with 40 CFR 60 Appendix A, Methods 5 and 9.

4. Specific Monitoring Requirements:
A. Particulate filters shall be inspected at a minimum of once each month.

B. The permittee shall perform a qualitative visual observation of the opacity of emissions from the particulate filter's exhaust stack at least once per operating month and maintain a log of the observations. If visible emissions are seen (not including condensed water vapor within the plume), then the opacity shall be determined by Reference Method 9. If emissions are in excess of the applicable opacity limit, then an inspection shall be initiated of the control equipment for all necessary repairs.

5. Specific Recordkeeping Requirements:
401 KAR 52:030, Section 1
A. Monthly records shall be kept of number of tons of virgin polystyrene pellets and the number of tons of regrind polystyrene processed by the extruders.

B. Monthly records (including MSDS) shall be maintained by the source for a period of five (5) years. Keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records may be kept offsite for the remaining 3 years. These records shall be made available to the Division or the U.S. EPA upon request.

C. HAP emissions shall be calculated monthly per Section D of this permit, and every month, a new 12-month rolling total for HAP emissions shall be calculated.

REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

5. Specific Recordkeeping Requirements (continued):

D. The permittee shall maintain a log of particulate filter inspections showing time of inspection, identity of inspecting personnel, and date of filter replacements.

6. Specific Reporting Requirements:

A. The permittee shall report HAP emissions as part of the semiannual reporting as required in Section F (5) & (6).

B. The permittee shall submit a copy of the control device inspection and repair log for those times when corrective actions are required due to an opacity exceedance, noted as required in Section B (4) (B). Copies of these records shall be submitted as a part of the semiannual reporting as required in Section F (5) & (6).

7. Specific Control Equipment Operating Conditions: None

8. Alternate Operating Scenarios: None

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

06 [06(15)] Kidder 31 Flexographic Press KPP-116

Description: Kidder 31 Flexographic Press KPP-116
Maximum continuous rating: 26 lbs/hr ink usage
Installed (1970)
Control Equipment: None

22(01) [22(01)] Kidder Flexographic Press 31 KPP 164

Description: Kidder Flexographic Press 31 KPP 164
Maximum continuous rating: 44.2 lbs/hr ink usage
Installed (1958 reconstructed 7/12/1996)
Control Equipment: None

APPLICABLE REGULATIONS:
401 KAR 52:030. Federally-enforceable permits for non-major sources. Applicable to sources that accept permit conditions that are legally and practically enforceable to limit their potential to emit (PTE) below the major source thresholds that would make them subject to 401 KAR 52:020.

1. **Operating Limitations:**
The usage rate of raw materials in all affected facilities shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

2. **Emission Limitations:**
See Section D for HAP emission limitations.

Compliance Demonstration Method:
HAP emissions from the above affected facilities shall be calculated using the equations below. Emissions are totaled source wide using the equations of Section D of this permit and compared with the limits set therein.

Total monthly organic HAP emissions, H, in pounds, shall be calculated using a material balance.

$$H = \sum_{i=1}^{p} M_{hi} C_{hi}$$

Where; M_{hi} = Mass of ink or other HAP containing material, i, applied in a month, lb.
C_{hi} = Organic HAP content of ink or other material, i, expressed as a weight-fraction, lb/lb.
i = Individual HAP containing material
p = Number of different HAP containing materials applied in a month.

3. **Testing Requirements:**
Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 4.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. **Specific Monitoring Requirements:** See Recordkeeping Requirements.

5. **Specific Recordkeeping Requirements:**

401 KAR 52:030, Section 1

A. Monthly records shall be kept of all inks, diluents, cleaners, etc., containing HAP, used for the above affected facilities, including the weight percentages of all individual HAP's.

B. Monthly records (including MSDS) shall be maintained by the source for a period of five (5) years. Keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records may be kept offsite for the remaining 3 years. These records shall be made available to the Division or the U.S. EPA upon request.

C. HAP emissions shall be calculated monthly per Section D of this permit, and every month, a new 12-month rolling total for HAP emissions shall be calculated.

6. **Specific Reporting Requirements:**

The permittee shall report HAP emissions as part of the semiannual reporting as required in Section F (5) & (6).

7. **Specific Control Equipment Operating Conditions:** None

8. **Alternate Operating Scenarios:** None

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

30 (30) Cup Forming Machines

Description: American Can Company, Model DCM
Maximum continuous rating: 120 - 140 Cups per minute
Installed (1960-1970)
Control Equipment: None

APPLICABLE REGULATIONS:
401 KAR 52:030. Federally-enforceable permits for non-major sources. Applicable to sources that accept permit conditions that are legally and practically enforceable to limit their potential to emit (PTE) below the major source thresholds that would make them subject to 401 KAR 52:020.

1. Operating Limitations:
The usage rate of raw materials in all affected facilities shall be restricted so the emission limitations as set forth in Section D of this permit are not exceeded.

2. Emission Limitations:
See Section D for HAP emission limitations.

Compliance Demonstration Method:
HAP emissions from the above affected facilities shall be calculated using the equations below. Emissions are totaled source wide using the equations of Section D of this permit and compared with the limits set therein.

Total monthly organic HAP emissions, H, in pounds, shall be calculated using a material balance.

$$H = \sum_{i=1}^{p} M_{hi} C_{hi}$$

Where; M_{hi} = Mass of adhesive, i, applied in a month, lb.
C_{hi} = Organic HAP content of adhesive, i, expressed as a weight-fraction, lb/lb.
i = Individual HAP containing adhesive, (i.e. toluene, xylene, etc.)
p = Number of different adhesives applied in a month.

3. Testing Requirements:
Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 4.

4. Specific Monitoring Requirements: See Recordkeeping Requirements.

5. Specific Recordkeeping Requirements:
401 KAR 52:030, Section 1
A. Monthly records shall be kept of all adhesives containing HAP, used for the above affected facilities, including the weight percentages of all individual HAP's.

REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

5. Specific Recordkeeping Requirements (continued):

B. Monthly records (including MSDS) shall be maintained by the source for a period of five (5) years. Keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. Records may be kept offsite for the remaining 3 years. These records shall be made available to the Division or the U.S. EPA upon request.

C. HAP emissions shall be calculated monthly per Section D of this permit, and every month, a new 12-month rolling total for HAP emissions shall be calculated.

6. Specific Reporting Requirements:

The permittee shall report HAP emissions as part of the semiannual reporting as required in Section F (5) & (6).

7. Specific Control Equipment Operating Conditions: None

8. Alternate Operating Scenarios: None

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP 23(01), 23(02), 27; Polypropylene Extruders and Thermoforming Machines

23(01) [23(01)] (2) Polypropylene Extruders, (1) Casting Unit, (1) Thermoformer

Description: (2) Cincinnati Milicron Extruders, installed (7/1999)
(1) HPM Casting Unit, installed (8/1999)
(1) Brown Thermoforming Machine, installed (5/1999)
(1) Cumberland Grinder (5/1999)
Maximum continuous rating: 3,200 lbs/hr
Control Equipment: See below **

23(02) [23(02)] (2) Polypropylene Extruders, (1) Casting Unit, (1) Thermoformer

Description: (2) Cincinnati Milicron Extruders, installed (7/2000)
(1) HPM Casting Unit, installed (8/2000)
(1) Brown Thermoforming Machine, installed (5/2000)
(1) Cumberland Grinder (5/2000)
Maximum continuous rating: 3,200 lbs/hr
Control Equipment: See below **

** Regrind material pneumatically conveyed to storage where it is separated by (2) cyclones, [(1) from each grinder above.] Exhaust from cyclones are sent to a single large Torit filter for dust control. Filter exhausts inside of building.

27 (27) Polypropylene Extruder, Thermoformer, Trim Press

Description: (1) Extruder: NRM, Model: 6" extruder at 24:1
(1) Former: Brown Machine, Model: 821
(1) Trim Press: Brown Machine, Model: T-350
(1) Cumberland Grinder
Installed (7/25/2004)
Control Equipment: Cyclone and Torit filter for regrind material

APPLICABLE REGULATIONS:
401 KAR 59:010, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

1. **Operating Limitations:**
401 KAR 59:010
Particulate filters shall be in place and functional at all times of operation.

REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

2. Emission Limitations:

401 KAR 59:010

(1) Section 3(1)(a) limits visible emissions from each stack to less than 20% opacity.

Compliance Demonstration Method:

Compliance is assumed when the particulate filters are in place and operating according to the manufacturer's recommendations, and the filters are exhausting inside of the building enclosure. See, **1. Operating Limitations**, and **7. Specific Control Equipment Operating Conditions**.

(2) Section 3(2) limits emissions of particulate matter to 4.80 lbs/hr at the maximum rate of 3200 lbs/hour. For process rates between 1000 lbs/hr and 3200 lbs/hr, the allowable emissions should be calculated from the following equation;

$$E = 3.59 * P^{0.62}$$

Where, E = rate of emission in lb/hr
P = process weight rate in tons/hr

For processing rates of 1000 lbs/hr or less, the allowable emission rate is 2.34 lbs/hr.

Compliance Demonstration Method:

Compliance is assumed when the particulate filters are in place and operating according to the manufacturer's recommendations, and the filters are exhausting inside of the building enclosure. See, **1. Operating Limitations**, and **7. Specific Control Equipment Operating Conditions**.

3. Testing Requirements:

If deemed necessary, the Cabinet shall require testing for particulate emissions in accordance with 40 CFR 60 Appendix A, Methods 5 and 9.

4. Specific Monitoring Requirements: None

5. Specific Recordkeeping Requirements: None

6. Specific Reporting Requirements: None

7. Specific Control Equipment Operating Conditions:

The Torit filters shall be maintained and operated in accordance with the manufacturer's recommendations.

8. Alternate Operating Scenarios: None

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP 02, 03, 05, 14; Affected Facilities Emitting Particulate Matter

02 [02(01)] Resin Hopper Car Unloading (polystyrene pellets)

Description: Hopper car unloading and pneumatic conveying of polystyrene plastic pellets
Premier Pneumatics Cyclones, Size 4, used for product separation
Maximum continuous rating: 20,000 lbs/hour
Installed (06/05/1987)
Control Equipment: Premier Pneumatics Inline Filter on cyclone exhaust for dust collection

03 [03(01)] Six Resin Holding Silos (polystyrene)

Description: Pneumatic conveying and storage of polystyrene plastic;

Two (2) resin holding silos (12'x54') – Virgin polystyrene from railcar unloading
Premier Pneumatics Cyclones, Size 4, used for product separation
Maximum continuous rating: 20,000 lbs/hour
Installed (06/05/1987)
Control Equipment: None

Four (4) resin holding silos (10'x42')
(2) silos used for virgin polystyrene from truck unloading
(2) silos used for regrind material
Premier Pneumatics Cyclones, Size 7, used for product separation
Maximum continuous rating: 3,500 lbs/hour
(3) installed (6/5/1987); (1) installed (6/1992)
Control Equipment: None

05 [05(21)] Waste Paper Cyclone

Description: Ohio Blow Pipe Company, Waste Paper Cyclone
Separates trim from cup forming equipment to baling equipment
Maximum continuous rating: 1,150 lbs/hour waste paper, (78,000 cfm)
Installed (12/11/1980)
Control Equipment: None

14 [14(01)] Langston Slitter w/ small cyclone

Description: Langston Slitter
Slits rolls of paper for use in cup forming equipment
Maximum continuous rating: 1,800 lbs/hour printed and unprinted paper
Installed (7/1992)
Control Equipment: Ohio Blow Pipe Cyclone (1,375 scfm)

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

APPLICABLE REGULATIONS:

401 KAR 59:010, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

1. Operating Limitations:

401 KAR 59:010

Particulate filters shall be in place and functional whenever railcar unloading is occurring.

2. Emission Limitations:

401 KAR 59:010

(1) Section 3(1)(a) limits visible emissions from each stack to less than 20% opacity.

Compliance Demonstration Method:

See **4. Monitoring Requirements**

(2) Section 3(2) limits emissions of particulate matter to a maximum value based on the input process weight rate according to the formula.

$$E = 3.59 * P^{0.62}$$

Where, E = rate of emission in lb/hr
P = process weight rate in tons/hr

For the emission points above the maximum allowable emission rates and the corresponding process rates are;

Emission Point (02), 14.97 lbs/hr @ 20,000 lbs/hr
Emission Point (03), 14.97 lbs/hr @ 20,000 lbs/hr (railcar unloading)
Emission Point (03), 5.08 lbs/hr @ 3500 lbs/hr
Emission Point (05), 2.55 lbs/hr @ 1150 lbs/hr
Emission Point (14), 3.36 lbs/hr @ 1800 lbs/hr

Use the equation above to determine allowable emission rates for process weight rates other than the maximum values given above.

For processing rates of 1000 lbs/hr or less, the allowable emission rate is 2.34 lbs/hr.

Compliance Demonstration Method:

See **4. Monitoring Requirements**

3. Testing Requirements:

If deemed necessary, the Cabinet shall require testing for particulate emissions in accordance with 40 CFR 60 Appendix A, Methods 5 and 9.

REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

4. Specific Monitoring Requirements:

A. The particulate filter used for dust control from the railcar unloading shall be inspected at least once per month.

B. The permittee shall perform a qualitative visual observation of the opacity of emissions from the waste paper cyclone and the Langston slitter at least once per operating month while the units are in operation, and maintain a log of the observations. If visible emissions from the vents are seen, (not including condensed water vapor within the plume), then the opacity shall be determined by Reference Method 9. If emissions are in excess of the applicable opacity limit, then an inspection shall be initiated of control equipment for all necessary repairs.

C. The permittee shall perform a qualitative visual observation of the opacity of emissions from the resin silo(s) during each rail-car unloading event, and maintain a log of the observations. If visible emissions are seen (not including condensed water vapor within the plume), then the opacity shall be determined by Reference Method 9. If emissions are in excess of the applicable opacity limit, then an inspection shall be initiated of control equipment for all necessary repairs.

(1) If the unloading takes place when ambient conditions prevent the opacity reading, the unloading event shall still be noted in the log, along with a brief explanation of the conditions preventing the opacity observation.

(2) With each unloading event, the permittee shall note which silo(s) are being filled.

5. Specific Recordkeeping Requirements:

A. The permittee shall maintain a log of railcar unloader particulate filter inspections showing time of inspection, identity of inspecting personnel, and date of filter replacements.

B. With each opacity observation note the date, time, and identity of the inspecting personnel.

6. Specific Reporting Requirements:

The permittee shall submit a copy of the control device inspection and repair log for those times when corrective actions are required due to an opacity exceedance, noted as required in Section B (4) (B). Copies of these records shall be submitted as a part of the semiannual reporting as required in Section F (5) & (6).

7. Specific Control Equipment Operating Conditions: None

8. Alternate Operating Scenarios: None

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP 08, 09, 28, 29; Combustion Equipment

08 [08(01)] Two (2) Indirect Heat Exchangers

Description: (2) Cyclotherm, C21000, Indirect Heat Exchangers
Natural gas-fired
Maximum continuous rating: (25.2 MMBtu/hr) each
Installed (1969)
Control Equipment: None

09 [09(01)] Six (6) Indirect Heat Exchangers

Description: Superior, Indirect Heat Exchangers
Natural gas-fired
Maximum continuous rating: (5.2 MMBtu/hr) each
Installed (1958)
Control Equipment: None

28 (28) Two (2) Water Heaters

Description: Atlantic Water Heaters
Natural gas-fired
Maximum continuous rating: (3.1 MMBtu/hr) each
Installed (1958)
Control Equipment: None

29 (29) Four (4) Indirect Heat exchangers

Description: Johnson JA-4200, Indirect Heat Exchangers
Natural gas-fired
Maximum continuous rating: (5.25 MMBtu/hr) each
Installed (1960)
Control Equipment: None

APPLICABLE REGULATIONS:
401 KAR 61:015. Existing indirect heat exchangers. Applicable per Section 2 (1); "Affected facility" means an indirect heat exchanger having a heat input capacity of more than one (1) million BTU per hour. Regulation is applicable to each affected facility commenced before April 9, 1972.

1. **Operating Limitations:** Equipment shall continue to use Natural Gas.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

2. Emission Limitations:

401 KAR 61:015

(1) Section 4(3) limits visible emissions from each stack to less than 40% opacity except:

4(3)(c) For emissions from an indirect heat exchanger during building a new fire for the period required to bring the boiler up to operating conditions provided the method used is that recommended by the manufacturer and the time does not exceed the manufacturer's recommendations.

Compliance Demonstration Method:

Observance of **1. Operating Limitations** above shall constitute compliance.

Emission Point (9) & (28)

(1) Section 4(1) limits emissions of particulate matter to (0.55) pounds per million BTU actual heat input.

(2) Section 5(1) (a) limits emissions of sulfur dioxide to (5.08) pounds per million BTU actual heat input.

Emission Points (29)

(1) Section 4(1) limits emissions of particulate matter to (0.50) pounds per million BTU actual heat input.

(2) Section 5(1) (a) limits emissions of sulfur dioxide to (4.80) pounds per million BTU actual heat input.

Emission Points (8)

(1) Section 4(1) limits emissions of particulate matter to (0.43) pounds per million BTU actual heat input.

(2) Section 5(1) (a) limits emissions of sulfur dioxide to (4.44) pounds per million BTU actual heat input.

Compliance Demonstration Method:

Observance of **1. Operating Limitations** above shall constitute compliance.

3. Testing Requirements:

Testing shall be conducted at such times as may be required by the Cabinet in accordance with Regulations 401 KAR 59:005 Section 2(2) and 401 KAR 50:045 Section 4.

4. Specific Monitoring Requirements: None

5. Specific Recordkeeping Requirements: None

6. Specific Reporting Requirements: None

7. Specific Control Equipment Operating Conditions: None

8. Alternate Operating Scenarios: None

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to 401 KAR 52:030, Section 6. While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

	Description	Generally Applicable Regulation
1.	Waste paper baling operations	None
2.	Truck unloading and Storage Silos (Virgin Polypropylene pellets) Material handling cyclones (3) Premier Pneumatics, Size 7, installed (5/1999)	59:010
3.	Eleven (11) Bagging machines (packaging)	None
4.	Gluing operations (packaging) Hot Melt Adhesives used to package finished products	None
5.	Wax Treaters, (50) operating, utilizing paraffin wax 46 installed - (8/27/1982) 2 installed - (3/21/2003) 2 installed - (6/23/2003) (2 additional Wax Treaters located in storage)	59:010
6.	EP 22(02), Two (2) N.G. Fired Dryers (0.75 MMBtu/hr) each, (1) preheat & (1) postheat Used with Kidder Press KPP 164 [EP 22(01)]	None
7.	EP 22(03), Wax Impregnation Oven (1.0 MMBtu/hr) Used with Kidder Press KPP 164 [EP 22(01)]	None
8.	2 Humidification Units N.G. Fired Burners, (0.45 MMBtu/hr) each	None

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

1. As required by Section 1b of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10, compliance with annual emissions and processing limitations contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

2. **Emission Limitations:**

   A. The permittee shall limit source wide emissions of Single Hazardous Air Pollutants (HAP) to 9 tons or less, during any consecutive 12 months period. [401 KAR 52:030]

   Compliance Demonstration Method:

   $$\text{Single HAP Emission;} \quad HAP_j = \sum_{i=1}^{n} (HAP_j)_i$$

   Where, HAP_j = individual HAP emission (i.e. styrene, toluene, etc.)
   $(HAP_j)_i$ = amount of HAP_j emitted at emission point "i ".
   n = total number of emission points

   B. The permittee shall limit source wide emissions of Combined Hazardous Air Pollutants (HAP) to 22.5 tons or less, during any consecutive 12 months period. [401 KAR 52:030]

   Compliance Demonstration Method:

   $$\text{Combined HAP Emissions} = \sum_{j=1}^{m} HAP_j$$

   Where, HAP_j = individual HAP emission (i.e. styrene, toluene, etc.)
   m = total number of single HAP emissions

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

1. Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

1. Pursuant to Section 1b (IV)(1) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10, when continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
   a. Date, place (as defined in this permit), and time of sampling or measurements;
   b. Analyses performance dates;
   c. Company or entity that performed analyses;
   d. Analytical techniques or methods used;
   e. Analyses results; and
   f. Operating conditions during time of sampling or measurement.

2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality [401 KAR 52:030 Section 3(1)(f)1a and Section 1a (7) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

3. In accordance with the requirements of 401 KAR 52:030 Section 3(1)f the permittee shall allow authorized representatives of the Cabinet to perform the following during reasonable times:
   a. Enter upon the premises to inspect any facility, equipment (including air pollution control equipment), practice, or operation;
   b. To access and copy any records required by the permit:
   c. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements.

   Reasonable times are defined as during all hours of operation, during normal office hours; or during an emergency.

4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

5. Summary reports of any monitoring required by this permit, other than continuous emission or opacity monitors, shall be submitted to the Regional Office listed on the front of this permit at least every six (6) months during the life of this permit, unless otherwise stated in this permit. For emission units that were still under construction or which had not commenced operation at the end of the 6-month period covered by the report and are subject to monitoring requirements in this permit, the report shall indicate that no monitoring was performed during the previous six months because the emission unit was not in operation.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

6. The semi-annual reports are due by January 30th and July 30th of each year. Data from the continuous emission and opacity monitors shall be reported to the Technical Services Branch in accordance with the requirements of 401 KAR 59:005, General Provisions, Section 3(3). All reports shall be certified by a responsible official pursuant to 401 KAR 52:030 Section 22. All deviations from permit requirements shall be clearly identified in the reports.

7. In accordance with the provisions of 401KAR 50:055, Section 1 the owner or operator shall notify the Regional Office listed on the front of this permit concerning startups, shutdowns, or malfunctions as follows:
   a. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
   b. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall submit written notice upon request.

8. The owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F.7 above) to the Regional Office listed on the front of this permit within 30 days. Other deviations from permit requirements shall be included in the semiannual report required by Section F.5 [Section 1b V(3) and (4) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

9. Pursuant to 401KAR 52:030, Section 21, the permittee shall annually certify compliance with the terms and conditions contained in this permit by completing and returning a Compliance Certification Form (DEP 7007CC) (or an alternative approved by the regional office) to the Regional Office listed on the front of this permit in accordance with the following requirements:
   a. Identification of each term or condition;
   b. Compliance status of each term or condition of the permit;
   c. Whether compliance was continuous or intermittent;
   d. The method used for determining the compliance status for the source, currently and over the reporting period.
   e. For an emissions unit that was still under construction or which has not commenced operation at the end of the 12-month period covered by the annual compliance certification, the permittee shall indicate that the unit is under construction and that compliance with any applicable requirements will be demonstrated within the timeframes specified in the permit.

SECTION F - MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

f. The certification shall be postmarked by January 30th of each year. **Annual compliance certifications should be mailed to the following addresses:**

Division for Air Quality Frankfort Regional Office 643 Teton Trail, Suite B Frankfort, KY 40601	Division for Air Quality Central Files 803 Schenkel Lane Frankfort, KY 40601

10. In accordance with 401KAR 52:030, Section 3(1)(d), the permittee shall provide the Division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission survey is mailed to the permittee. If a KYEIS emission report is not mailed to the permittee, comply with all other emission reporting requirements in this permit.

11. Pursuant to Section VII (3) of the policy manual of the Division for Air Quality as referenced in 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the Division by the source or its representative within forty-five days after the completion of the fieldwork.

12. The Cabinet may authorize the temporary use of an emission unit to replace a similar unit that is taken off-line for maintenance, if the following conditions are met:
    a. The owner or operator shall submit to the Cabinet, at least ten (10) days in advance of replacing a unit, the appropriate Forms DEP7007AI to DD that show:
        i. The size and location of both the original and replacement units; and
        ii. Any resulting change in emissions;
    b. The PTE of the replacement unit shall not exceed that of the original unit by more than twenty-five (25) percent of a major source threshold, and the emissions from the unit shall not cause the source to exceed the emissions allowable under the permit;
    c. The PTE of the replacement unit or the resulting PTE of the source shall not subject the source to a new applicable requirement;
    d. The replacement unit shall comply with all applicable requirements; and
    e. The source shall notify Regional office of all shutdowns and start-ups.
    f. Within six (6) months after installing the replacement unit, the owner or operator shall:
        i. Re-install the original unit and remove or dismantle the replacement unit; or
        ii. Submit an application to permit the replacement unit as a permanent change.

SECTION G - GENERAL PROVISIONS

(a) General Compliance Requirements

1. The permittee shall comply with all conditions of this permit. A noncompliance shall be a violation of 401 KAR 52:030 Section 3(1)(b) and is also a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act). Noncompliance with this permit is grounds for enforcement action including but not limited to the termination, revocation and reissuance, revision, or denial of a permit [Section 1a (2) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition [Section 1a (5) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

3. This permit may be revised, revoked, reopened and reissued, or terminated for cause in accordance with 401 KAR 52:030 Section 18. The permit will be reopened for cause and revised accordingly under the following circumstances:
   a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to 401 KAR 52:030 Section 12;
   b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
   c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

4. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the Division may provide a shorter time period in the case of an emergency.

5. The permittee shall furnish information upon request of the Cabinet to determine if cause exists for modifying, revoking and reissuing, or terminating the permit; or compliance with the conditions of this permit [Sections 1a (6) and (7) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

SECTION G - GENERAL PROVISIONS (CONTINUED)

6. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority [401 KAR 52:030 Section 7(1)].

7. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit [Section 1a (11) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

8. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance [Section 1a (3) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

9. Except for requirements identified in this permit as state-origin requirements, all terms and conditions shall be enforceable by the United States Environmental Protection Agency and citizens of the United States [Section 1a (12)(b) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

10. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038 Section 3(6) [Section 1a (9) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

11. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance [401 KAR 52:030 Section 11(3)].

12. This permit does not convey property rights or exclusive privileges [Section 1a (8) of the *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources* incorporated by reference in 401 KAR 52:030 Section 10].

13. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Environmental and Public Protection or any other federal, state, or local agency.

14. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry.

15. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders.

SECTION G - GENERAL PROVISIONS (CONTINUED)

16. This permit consolidates the authority of any previously issued PSD, NSR, or Synthetic minor source preconstruction permit terms and conditions for various emission units and incorporates all requirements of those existing permits into one single permit for this source.

17. Permit Shield – A permit shield shall not protect the owner or operator from enforcement actions for violating an applicable requirement prior to or at the time of permit issuance. Compliance with the conditions of this permit shall be considered compliance with:
    a. Applicable requirements that are included and specifically identified in this permit; and
    b. Non-applicable requirements expressly identified in this permit.

18. Emission units described in this permit shall demonstrate compliance with applicable requirements if requested by the Division [401 KAR 52:030 Section 3(1)(c)].

19. The authority to operate granted through this permit shall cease to apply if the source fails to submit additional information requested by the Division after the completeness determination has been made on any application, by whatever deadline the Division sets [401 KAR 52:030 Section 8(2)].

(b) Permit Expiration and Reapplication Requirements

This permit shall remain in effect for a fixed term of five (5) years following the original date of issue. Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the Division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the Division [401 KAR 52:030 Section 12].

(c) Permit Revisions

1. Minor permit revision procedures specified in 401 KAR 52:030 Section 14 (3) may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of 401 KAR 52:030 Section 14 (2).

2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority within ten (10) days following the transfer.

SECTION G - GENERAL PROVISIONS (CONTINUED)

(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements

EP 27 Polypropylene Extruder, Thermoformer, Trim Press

1. Construction of any process and/or air pollution control equipment authorized by this permit shall be conducted and completed only in compliance with the conditions of this permit.

2. Within thirty (30) days following commencement of construction and within fifteen (15) days following start-up and attainment of the maximum production rate specified in the permit application, or within fifteen (15) days following the issuance date of this permit, whichever is later, the permittee shall furnish to the Regional Office listed on the front of this permit in writing, with a copy to the Division's Frankfort Central Office, notification of the following:
   a. The date when construction commenced.
   b. The date of start-up of the affected facilities listed in this permit.
   c. The date when the maximum production rate specified in the permit application was achieved.

3. Pursuant to 401 KAR 52:030, Section 3(2), unless construction is commenced within eighteen (18) months after the permit is issued, or begins but is discontinued for a period of eighteen (18) months or is not completed within a reasonable timeframe then the construction and operating authority granted by this permit for those affected facilities for which construction was not completed shall immediately become invalid. Upon written request, the Cabinet may extend these time periods if the source shows good cause.

4. For those affected facilities for which construction is authorized by this permit, a source shall be allowed to construct with the draft permit. Operational or final permit approval is not granted by this permit until compliance with the applicable standards specified herein has been demonstrated pursuant to 401 KAR 50:055. If compliance is not demonstrated within the prescribed timeframe provided in 401 KAR 50:055, the source shall operate thereafter only for the purpose of demonstrating compliance, unless otherwise authorized by Section I of this permit or order of the Cabinet.

5. This permit shall allow time for the initial start-up, operation, and compliance demonstration of the affected facilities listed herein. However, within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a performance demonstration on the affected facilities in accordance with 401 KAR 50:055, General compliance requirements.

6. Terms and conditions in this permit established pursuant to the construction authority of 401 KAR 51:017 or 401 KAR 51:052 shall not expire.

SECTION G - GENERAL PROVISIONS (CONTINUED)

(e) Acid Rain Program Requirements

1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

(f) Emergency Provisions

1. Pursuant to 401 KAR 52:030 Section 23(1), an emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
   a. An emergency occurred and the permittee can identify the cause of the emergency;
   b. The permitted facility was at the time being properly operated;
   c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and,
   d. The permittee notified the Division as promptly as possible and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to an emergency. The notice shall include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken.
2. Notification of the Division does not relieve the source of any other local, state or federal notification requirements.
3. Emergency conditions listed in General Provision G(f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement [401 KAR 52:030 Section 23(3)].
4. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof[401 KAR 52:030 Section 23(2)].

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 401 KAR Chapter 68, Chemical Accident Prevention, which incorporates by reference 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:

   RMP Reporting Center
   P.O. Box 3346
   Merrifield, VA, 22116-3346
2. If requested, submit additional relevant information to the Division or the U.S. EPA.

SECTION G - GENERAL PROVISIONS (CONTINUED)

(h) Ozone depleting substances

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
   a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
   b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
   c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
   d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.
   e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
   f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, *Servicing of Motor Vehicle Air Conditioners*.

SECTION H - ALTERNATE OPERATING SCENARIOS

None

SECTION I - COMPLIANCE SCHEDULE

None